IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	NO. 6:15CR61 (02)
	§	JUDGE CLARK
TAYLOR KEETH	§	

ELEMENTS OF THE OFFENSE

The United States of America, by and through the United States Attorney for the Eastern District of Texas, files this pleading summarizing the elements of the offense to which the defendant intends to enter a plea of guilty to Count Three of the First Superseding Indictment.

Title 18, United States Code, Section 2251(e), makes it a crime for anyone to conspire to commit an offense under Section 2251 of Title 18. The defendant is charged with conspiring to sexually exploit children, a violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Title 18, United States Code, Section 2251(a) makes it a crime to employ, use, persuade, induce, entice, or coerce any minor to engage in sexually explicit conduct for the purpose of producing a visual depiction or transmitting a live visual depiction of such conduct.

To establish that the defendant is guilty of Conspiracy to Sexually Exploit Children, the government must prove the following beyond a reasonable doubt:

First: That two or more persons, directly or indirectly, reached an agreement to employ, use, persuade, induce, entice, or coerce any minor to engage in sexually explicit conduct for the purpose of producing a visual depiction or transmitting a live visual depiction of such conduct;

Second: That the defendant knew of the unlawful purpose of the agreement; and

Third: That the defendant joined in the agreement willfully, that is, with the intent to further its unlawful purpose.

Respectfully submitted,

BRIT FEATHERSTON
ACTING UNITED STATES ATTORNEY

/s/ Nathaniel C. Kummerfeld
NATHANIEL C. KUMMERFELD
Assistant United States Attorney
Texas Bar No. 24060122
110 N. College, Ste. 700
Tyler, TX 75702
(903) 590-1400
(903) 590-1439 (fax)
Nathaniel.Kummerfeld@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Elements of the Offense was served on counsel of record for defendant via the court's CM/ECF system on this the 5th day of December, 2016.

/s/ Nathaniel C. Kummerfeld
Nathaniel C. Kummerfeld